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10001 Park Run Drive Las Vegas, Nevada 89145 (702) 382-0711 FAX: (702) 382-5816

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1	Marquis Aurbach Coffing
	Nick D. Crosby, Esq.
2	Nevada Bar No. 8996
	10001 Park Run Drive
3	Las Vegas, Nevada 89145
	Telephone: (702) 382-0711
4 .	Facsimile: (702) 382-5816
	ncrosby@maclaw.com
5	Attorneys for Joseph Lombardo
1 7	
6	IINIT

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

DOES 1-16; and UNKNOWN NAMED DOES 1-1000,

Plaintiffs.

Case No.: 2:1:

2:15-cv-01638-RFB-CWH

vs.

ADAM PAUL LAXALT, Attorney General of the State of Nevada; CHRIS PERRY, Director of the Nevada Department of Public Safety; NATALIE WOOD, Chief Parole and Probation Division of the Nevada Department of Public Safety; PATRICK J. CONMAY, Chief Records and Technology Division of the Nevada Department of Public Safety; JOSEPH LOMBARDO, Sheriff of the Las Vegas Metropolitan Police Department, ALEXANDER PEREZ, Chief of the North Las Vegas Police Department; STEVEN WOLFSON, District Attorney of Clark County; CHIEF PATRICK MOERS, Henderson Police Department,

Defendants.

STIPULATION AND ORDER TO DISMISS CERTAIN DEFENDANTS WITHOUT PREJUDICE

Plaintiffs DOES -16 and Unnamed Does 1-1000 (collectively "Plaintiffs"), by and through their attorneys of record, Robert Draskovich, Esq., Gary A. Modafferi, Esq. and Allen Lichtenstein, Esq. and Defendants, Patrick E. Moers, by and through his attorneys of record, Henderson City Attorney's Office; Defendant Joseph Lombardo, by and through his attorneys of record, Nick D. Crosby, Esq. of the law firm of Marquis Aurbach Coffing; and Alexander Perez, by and through his attorneys of record, North Las Vegas City Attorney's Office, hereby agree and stipulate that all claims asserted by the Plaintiffs and against Defendants Lombardo, Moers, and Perez (collectively "Law Enforcement Defendants"), whether known or unknown in the

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above-entitled	action,	shall	be d	lismissed	without	prejudice	as	they	relate	to	the	Law
Enforcement D	efendan	ts.										, 1 . is
It is fur	rther agr	eed tha	at the	Plaintiff	s and the	Law Enfor	cem	ent D	efenda	nts	shall	each
bear their own	attorney	s fees	and c	costs and	shall not	be subject to	o an	v awa	ard of a	ttor	nevs	fees

It is further agreed that the Law Enforcement Defendants will be subject to and shall abide by any injunction, declaratory relief granted or order of the Nevada Supreme Court or District Court in the above-entitled action, provided, however, the Law Enforcement Defendants shall not be liable for any damages ordered in any such order, decree or judgment, including any award of attorneys fees or costs.

It is further ordered that Plaintiffs, through their counsel of record, shall immediately, or as soon as reasonably possible, notify the Law Enforcement Defendants of any order, injunction or decree or modification of any such order, injunction or decree issued in the above-captioned matter, including any order, injunction, or decree issued by the Nevada Supreme Court.

IT IS SO STIPULATED this __ day of September, 2015.

costs or damages arising from the above-entitled action.

PLAINTIFFS

HENDERSON CITY ATTORNEY'S OFFICE

Robert M. Draskovich, Esq. Nevada State Bar No. 6275 Gary A. Modafferi, Esq. Nevada State Bar No. 12450 815 S. Casino Center Blvd. Las Vegas, Nevada 89101 Attorney for Plaintiffs

Josh M. Reid, Esq.
Nevada State Bar No. 7497
Michael J. Oh, Esq.
Nevada State Bar No. 7470
240 Water Street, 4th Floor
Henderson, Nevada 89015
Attorneys for Defendant Patrick E. Moers

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above-entitled	action,	shall	be	dismissed	without	prejudice	as	they	relate	to	the	Law
Enforcement D	efendan	ts.										

It is further agreed that the Plaintiffs and the Law Enforcement Defendants shall each bear their own attorneys fees and costs and shall not be subject to any award of attorneys fees, costs or damages arising from the above-entitled action.

It is further agreed that the Law Enforcement Defendants will be subject to and shall abide by any injunction, declaratory relief granted or order of the Nevada Supreme Court or District Court in the above-entitled action, provided, however, the Law Enforcement Defendants shall not be liable for any damages ordered in any such order, decree or judgment, including any award of attorneys fees or costs.

It is further ordered that Plaintiffs, through their counsel of record, shall immediately, or as soon as reasonably possible, notify the Law Enforcement Defendants of any order, injunction or decree or modification of any such order, injunction or decree issued in the above-captioned matter, including any order, injunction, or decree issued by the Nevada Supreme Court.

IT IS SO STIPULATED this __ day of September, 2015.

PLAINTIFFS

Robert M. Draskovich, Esq.

Nevada State Bar No. 6275 Gary A. Modafferi, Esq. Nevada State Bar No. 12450 815 S. Casino Center Blvd. Las Vegas, Nevada 89101 Attorney for Plaintiffs HENDERSON CITY ATTORNEY'S OFFICE

Josh M. Reid, Esq.
Nevada State Bar No. 7497
Michael J. Oh, Esq.
Nevada State Bar No. 7470
240 Water Street, 4th Floor
Henderson, Nevada 89015
Attorneys for Defendant Patrick E. Moers

Las Vegas, Nevada 89145 (702) 382-0711 FAX: (702) 382-5816

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DATED this 25th day of January, 2016.

Page 3 of 3

1	MARQUIS AURBACH COFFING
2	:
3	Nick D. Crosby, Esq. Nevada Bar No. 8996
4	10001 Park Run Drive
5	Las Vegas, Nevada 89145 Attorney for Joseph Lombardo
6	
7	NORTH LAS VEGAS CITY ATTORNEY GENERAL'S OFFICE ATTORNEY'S OFFICE
8	(1)/10
9	By: By: Kimberly A. Buchanan, Esq.
10	Claudia Aguayo, Esq. Kimberly A. Buchanan, Esq. Nevada Bar No. 8351 Nevada Bar No. 5891 2250 North Las Vegas Blvd 555 E. Washington Street, Ste. 3900
11	North Las Vegas, NV 89030 Las Vegas, NV 89101 Attorney for Alexander Perez. Attorney for Adam Paul Laxalt,
12	Attorney General; Chris Perry, Natalie Wood and Patrick J. Conmay, Nevada
13	Department of Public Safety
14	ORDER
15	IT IS SO ORDERED that Defendant Joseph Lombardo, Defendant Patrick E. Moers, and
16	Defendant Alexander Perez are hereby dismissed from United States District Court, District of
17	Nevada, Case 15-cv-01638, without prejudice pursuant to the above stipulation.
17 18	Nevada, Case 15-cv-01638, without prejudice pursuant to the above stipulation.
	Nevada, Case 15-cv-01638, without prejudice pursuant to the above stipulation. DISTRICT COURT JUDGE
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	Case 2:15-cv-01638-RFB-CWH	Document 3	4 Filed 01/25/16 Page 6 of 6	
1	MARQUIS AURISACH COFFING			
1	MARGOIS AURBACH CUFFING			
2	Nick D. Crosby, Esq.			
3	Nevada Bar No. 8996			
4	10001 Park Run Drive Las Vegas, Nevada 8914			V 1644
5	Attorney for Joseph Lombardo			
6				
7	NORTH LAS VEGAS ATTORNEY'S OFFICE	CITY	ATTORNEY GENERAL'S OFFICE	
8				
9	By:Claudia Aguayo, Esq.		By: Kimberly A. Buchanan, Esq.	
10	Nevada Bar No. 8351 2250 North Las Vegas Blvd	er eksel is. Harita	Nevada Bar No. 5891 555 E. Washington Street, Ste. 3900)
1,1	North Las Vegas, NV 89030 Attorney for Alexander Perez		Las Vegas, NV 89101 Attorney for Adam Paul L	axalt,
12			Attorney General; Chris Perry, N Wood and Patrick J. Conmay, N	atalie evada
13	•		Department of Public Safety	
13	l - 1			
14		ORD	<u>ER</u>	
14	IT IS SO ORDERED that I		ER ph Lombardo, Defendant Patrick E. Moer	s, and
14 15		Defendant Jose		
14 15 16		Defendant Jose	ph Lombardo, Defendant Patrick E. Moer	
14 15 16 17	Defendant Alexander Perez are he	Defendant Jose	ph Lombardo, Defendant Patrick E. Moer	
14 15 16 17 18	Defendant Alexander Perez are he	Defendant Jose reby dismissed at prejudice pur	ph Lombardo, Defendant Patrick E. Moer d from United States District Court, Distr rsuant to the above stipulation.	
14 15 16 17 18 19	Defendant Alexander Perez are he	Defendant Jose reby dismissed at prejudice pur	ph Lombardo, Defendant Patrick E. Moer	
14 15 16 17 18 19 20	Defendant Alexander Perez are he	Defendant Jose reby dismissed at prejudice pur	ph Lombardo, Defendant Patrick E. Moer d from United States District Court, Distr rsuant to the above stipulation.	
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14 15 16 17 18 19 20 21 22 23 24 25 26	Defendant Alexander Perez are he	Defendant Jose reby dismissed at prejudice pur	ph Lombardo, Defendant Patrick E. Moered from United States District Court, District resuant to the above stipulation. STRICT COURT JUDGE	